

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL - 2 2025

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
)
VICENTE ORTIZ-MARQUEZ,)
a/k/a Alberto Gomez-Marquez)
)
Defendant.)

4:25CR354 JAR/SRW

INDICTMENT

The Grand Jury charges that:

COUNT ONE

1. On or about June 18, 2025, in the Eastern District of Missouri, the defendant,

**VICENTE ORTIZ-MARQUEZ,
a/k/a Alberto Gomez-Marquez**

an alien, was found in the United States after having been removed therefrom to Mexico, without having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Section 1326(a).

COUNT TWO

2. On or about June 18, 2025, in the Eastern District of Missouri, the defendant,

**VICENTE ORTIZ-MARQUEZ
a/k/a Alberto Gomez-Marquez,**

knowing he was an alien who was illegally and unlawfully in the United States, did knowingly possess a firearm which previously traveled in interstate or foreign commerce during or prior to being in his possession.

In violation of Title 18, United States Code, Section 922(g)(5)(A).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922 as set forth in Count Two, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation.

2. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. Smith & Wesson .40 semi-automatic pistol, Serial # JEJ5187
- b. Two magazines containing ammunition;

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

MATTHEW T. DRAKE
Acting United States Attorney

Kyle T. Bateman, #996646DC
Assistant United States Attorney